

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

HELBACHS CAFE LLC
DBA: HELBACHS CAFE ROASTERS &
KITCHEN,

Plaintiff,

CASE NO. 20-CV-758

v.

CITY OF MADISON,
COUNTY OF DANE,
JANEL HEINRICH,
MARCI PAULSEN, and
BONNIE KOENIG,
All individuals in their official capacity,

Defendants.

DEFENDANTS' NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT

To: **Brent Eisberner**
Levine Eisberner LLC
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Madison, WI 53713

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519 Green Bay Road
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PLEASE TAKE NOTICE that City of Madison, County of Dane, Janel Heinrich, Marci Paulsen, and Bonnie Koenig, by their attorneys, MUNICIPAL LAW & LITIGATION GROUP, S.C., hereby move the Court, pursuant to Fed. R. Civ. P. 56, for an Order granting their Motion for Summary Judgment and dismissing the Plaintiffs' Complaint on its merits and with prejudice.

This Motion is based upon the pleadings and proceedings herein, the attached Brief in Support, and the Affidavits of Sadie Zurfluh, Marci Paulsen, Bonnie Koenig, Janel Heinrich, and Doug Voegeli. Through this motion, the Defendants also seek their costs and fees.

Dated this 30th day of April, 2021.

**MUNICIPAL LAW & LITIGATION
GROUP, S.C.**

Attorneys for City of Madison, County of Dane,
Janel Heinrich, Marci Paulsen, and Bonnie Koenig

By: /s/ Remzy D. Bitar

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